

EXHIBIT A

CASE NO. 5:22-cv-68-BO

YOLANDA IRVING, individually and as the)	
natural parent and guardian of J.I., JUWAN)	
HARRINGTON, CYDNEEA HARRINGTON,)	
KENYA WALTON, individually and as the natural)	
parent and guardian of R.W., ZIYEL WHITLEY,)	
DYAMOND WHITLEY, KAMISHA WHITLEY,)	SEU OFFICER DEFENDANTS'
NANETTA GRANT as the natural parent and)	FIRST SET OF INTERROGATORIES
guardian of Z.G., and EMANCIPATE NC, INC.,)	AND REQUESTS FOR
)	PRODUCTION OF DOCUMENTS
Plaintiffs,)	TO PLAINTIFF
)	EMANCIPATE NC, INC.
v.)	
)	
THE CITY OF RALEIGH, Officer OMAR I.)	
ABDULLAH, Sergeant WILLIAM ROLFE,)	
Officer RISHAR PIERRE MONROE,)	
Officer MEGHAN CAROLINE GAY,)	
Officer DAVID MEAD, Officer JESUS ORTIZ,)	
Officer KYLE PERRIN, Officer MICHAEL)	
MOLLERE, Officer KYLE THOMPSON,)	
Officer VINCENT DEBONIS, Officer DANIEL)	
TWIDDY, Officer THOMAS WEBB,)	
Officer DAVID MCDONALD, Officer DAVID)	
GARNER, Chief of Police ESTELLA)	
PATTERSON, and City Manager MARCHELL)	
ADAMS-DAVID, in their individual capacities,)	
)	
Defendants.)	

Pursuant to Rule, 26, 33, and 34 of the Federal Rules of Civil Procedure, Defendant SEU Officers David Mead, Jesus Ortiz, Kyle Perrin, Michael Mollere, Kyle Thompson, Vincent Debonis, Daniel Twiddy, Thomas Webb, David McDonald, and David Garner, request that Plaintiff Emancipate NC, Inc., answer the following interrogatories and requests for production of documents within thirty (30) days of the date of this request. This request shall be continuing in nature until the day of trial, and Emancipate NC, Inc. is required to serve supplemental

responses as additional information may be found or is made available, as required by Rule 26 of the Federal Rules of Civil Procedure.

DEFINITIONS & INSTRUCTIONS

1. “Document” means any printed, typewritten, handwritten, or otherwise recorded matter of whatever character and all drafts of any such recorded matter, including, but not limited to, letters, booklets, certificates of title, forms, memoranda, telegrams, notes, catalogues, brochures, diaries, reports, drawings, charts, facsimiles, models, agreements, contracts, minutes, calendars, interoffice communications, intraoffice communications, electronic mails, attachments to electronic mails, electronic files, computer records, statements, announcements, photographs, audio or video tape recordings, motion pictures and any carbon, photographic, or electronic copies of any such material.

2. “Date,” when used herein, shall include the day, month, and year of the occurrence to which the Interrogatory refers. If any of the information referred to above is unavailable, so state, and give as much information as possible to identify the period of the occurrence.

3. When used herein, plural terms shall include the singular and singular terms shall include the plural.

4. When used herein, conjunctive terms (e.g., “and”) shall include the disjunctive (e.g., “or”) and disjunctive terms shall include the conjunctive.

5. To the extent any communications or other documents may be covered by the attorney-client privilege or work-product doctrine, please produce a privilege log of such communications and documents.

INTERROGATORIES

1. Describe every complaint, or any other information, that Emancipate NC, Inc. has received from January 1, 2014, to the present that relates to the execution of a search warrant by the Raleigh Police Department's Selective Enforcement Unit ("SEU"), or that otherwise relates to the SEU's entry into a home, including:

- (a) The source of the complaint or other information;
- (b) The date the complaint was made or information provided to Emancipate NC, Inc.;
- (c) The contents of the complaint or information; and
- (d) Any and all actions taken by Emancipate NC, Inc. as a result of the complaint or information received.

RESPONSE:

2. Identify all financial resources that Emancipate NC, Inc. spent, specifically in connection with responding to complaints or information received that are identified in response to Interrogatory No. 1.

RESPONSE:

3. Identify each and every matter that Emancipate NC, Inc. was not able to address because it allegedly has “been forced to divert its resources from other aspects of [its] work, and other parts of the state, to attend to problems related to No Knock and Quick Knock warrant executions by RPD.”

RESPONSE:

REQUESTS FOR PRODUCTION OF DOCUMENTS

1. Produce all documents that relate to the complaints and information that are responsive to Interrogatory No. 1.

RESPONSE:

2. Produce all documents that relate to the matters that are responsive to Interrogatory No. 3.

RESPONSE:

3. Produce any other documents that relate to Emancipate NC, Inc.’s allegation that it has “been forced to divert its resources from other aspects of [its] work, and other parts of the state, to attend to problems related to No Knock and Quick Knock warrant executions by RPD.”

RESPONSE:

4. Produce all documents, including communications, that relate to Emancipate NC, Inc.'s budgets from the years 2014 to the present.

RESPONSE:

5. Produce all non-privileged documents, including communications involving Emancipate NC, Inc. or its employees or agents, that relate to the Raleigh Police Department's execution of a search warrant at 1628B Burgundy Street on May 21, 2020.

RESPONSE:

6. Produce all non-privileged documents, including communications involving Emancipate NC, Inc. or its employees or agents, that relate to the conduct of Dennis Leon Williams, Jr. (a.k.a. Aspirin).

RESPONSE:

7. Produce all non-privileged communications between Emancipate NC, Inc. and any individual plaintiff or plaintiffs in this lawsuit.

RESPONSE:

This the 23rd day of November 2022.

/s/ Leslie C. Packer

Leslie C. Packer

N.C. State Bar No. 13640

Michelle A. Liguori

N.C. State Bar No. 52505

ELLIS & WINTERS LLP

P.O. Box 33550

Raleigh, North Carolina 27636

Telephone: (919) 865-7000

Facsimile: (919) 865-7010

leslie.packer@elliswinters.com

michelle.liguori@elliswinters.com

Counsel for SEU Officer Defendants

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on November 23, 2022, the foregoing document was served via electronic mail to all counsel of record as listed below:

Abraham Rubert-Schewel
Tin Fulton Walker & Owen, PLLC
119 E. Main Street
Durham, NC 27701
schewel@tinfulton.com
Counsel for Plaintiffs

Emily Gladden
Nichad Davis
Tin Fulton Walker & Owen, PLLC
204 N. Person Street
Raleigh, NC 27601
egladden@tinfulton.com
ndavis@tinfulton.com
Counsel for Plaintiffs

Michael Littlejohn, Jr.
Littlejohn Law, PLLC
PO Box 16661
Charlotte, NC 28297
mll@littlejohn-law.com
Counsel for Plaintiffs

Ian Mance
Elizabeth Simpson
Emancipate NC, Inc.
ian@emancipatenc.org
elizabeth@emancipatenc.org
Counsel for Plaintiffs

Jason Benton
Jessica Dixon
Parker Poe Admads & Bernstein, LLP
620 South Tyson Street, Suite 800
Charlotte, NC 28202
jasonbenton@parkerpoe.com
jessicadixon@parkerpoe.com
Counsel for Defendant Abdullah

Rodney Pettey
Alayna Poole
Yates McLamb & Weyher, LLP
PO Box 2889
Raleigh, NC 27602
rpettey@ymwlaw.com
apoole@ymwlaw.com
*Counsel for Defendants Monroe, Rattelade,
and Gay*

Norwood Blanchard, III
Crossley McIntosh Collier, & Edes, PLLC
5002 Randall Parkway
Wilmington, NC 28403
norwood@cmclawfirm.com
Counsel for Defendant Rolfe

Dorothy V. Kibler
Amy C. Petty
City of Raleigh
PO Box 590
Raleigh, NC 27602
Dorothy.kibler@raleighnc.gov
Amy.petty@raleighnc.gov
*Counsel for Defendants City of
Raleigh, Chief of Police Estella Patterson,
and City Manager Marchell Adams-David*

/s/ Leslie C. Packer

Leslie C. Packer
Michelle A. Liguori
Counsel for SEU Officer Defendants